

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TENNESSEE

FRIENDS OF GEORGE’S, INC.,)	
)	Case No. 2:23-cv-02176-TLP-tmp
PLAINTIFF,)	
)	
)	
)	COMPLAINT FOR VIOLATIONS OF
)	THE CIVIL RIGHTS ACT OF 1871, 42
v.)	U.S.C. § 1983
)	
)	
)	
STEVEN J. MULROY, <i>in his official and</i>)	
<i>individual capacity as District Attorney</i>)	
<i>General of Shelby County, Tennessee,</i>)	
)	
)	
DEFENDANTS)	

DECLARATION OF VANESSA RODLEY

Vanessa Rodley, under penalty of perjury, declares as follows:

1. I am over the age of eighteen (18) and am the President and Festival Director of Mid-South Pride Foundation, Inc.
2. Mid-South Pride Foundation, Inc. (“Mid-South Pride”) is a registered 501(c)3 non-profit that organizes and hosts an annual pride festival in Memphis, Tennessee.
3. Since the amendments to T.C.A. § 7-51-1407 were signed into law by Governor Bill Lee on February 27, 2023, Mid-South Pride has seen a noticeable decline in sponsorship for its 2023 festival.

4. Last year, Mid-South Pride had a total of 43 sponsors for its 2022 festival.
5. As of March 30, 2023, Mid-South Pride has only 23 sponsors for its 2023 festival.
6. Usually, 60 days out from their annual event, Mid-South Pride has secured 90% of its annual budget from sponsors.
7. This year, 63 days out from their annual event, Mid-South Pride has only 60% of its annual budget from sponsors.

I swear under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

Dated this 30th day of March, 2023

/s/ Vanessa Rodley

Vanessa Rodley